

United States District Court

SOUTHERN

DISTRICT OF

OHIO

UNITED STATES OF AMERICA
V.

CRIMINAL COMPLAINT

KAREEM COLE
PAUL BURKE aka Philip Davidson
STEVE RENNICK, SR. 02-248D
STEVE RENNICK, JR.
MATTHEW ALTON ELLIOT
EDDIE MOORE

CASE NUMBER: 02 248 D
thru

02 251 D

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. Between October 14 and 16, 2002 in Hamilton county, in the

Southern District of Ohio defendant(s) did, (Track Statutory Language of Offense)

knowingly combine, conspire, confederate, and agree to distribute and possess with intent to distribute marijuana, in excess of 100 kilograms, a Schedule I controlled substance,

in violation of Title 21 United States Code, Section(s) 846, 841(a)(1) & (b)(1)(B)

I further state that I am a(n) Agent with the Hamilton County Regional Narcotics Unit and that this complaint is based on the following facts:

See attached Affidavit.

Continued on the attached sheet and made a part hereof:

☒ Yes ☐ No

John E. Mercos
Signature of Complainant

Sworn to before me and subscribed in my presence,

10/18/02
Date

at Cincinnati, Ohio
City and State

Jack Sherman, Jr.
United States Magistrate Judge
Name & Title of Judicial Officer

Jack Sherman Jr
Signature of Judicial Officer

A F F I D A V I T

I, John Mercado, having been duly sworn and cautioned, declare and state as follows:

On October 15, 2002, Agents of the Regional Narcotics Unit (RENU) executed a search warrant at the residence of Eddie Moore, 2234 Highland Avenue, Norwood, Ohio. RENU Agents seized approximately thirty pounds of marijuana and arrested Eddie Moore. Eddie Moore told RENU Agents that he worked with Matt Elliot in the distribution of marijuana. Moore stated that Elliot would inform him when marijuana arrived, and Moore and Elliot would then pick up the marijuana and Moore would store it at his residence until it was sold. Elliot would then take the proceeds of the sales and return them to the suppliers. Moore stated that he and Elliot would obtain the marijuana from Steve Rennick Sr. Moore further stated that Steve Rennick's father, Steve Rennick, Sr., was the driver for Rennick's suppliers named Phillip and Kareem. RENU Agents were able to identify Phillip as Phillip Davidson, true name Paul Burke, and Kareem as Kareem Cole. Photographs of Davidson and Cole were obtained, and Moore positively identified Davidson and Cole as the same suppliers Kareem and Phillip. Moore related that he and Elliot received the marijuana found in Moore's home on October 15, 2002 at Rennick's warehouse located at 1975 West North Bend Road. Moore stated that Kareem Cole and Steve Rennick Jr. helped load the

marihuana into Moore's vehicle and that an additional 400 to 600 pounds were in the warehouse.

RENU Agents set up surveillance of the warehouse at 1975 West North Bend Road early on October 16, 2002. The agents observed Steve Rennick Jr. and Matt Elliot arrive the morning of October 16, 2002. A little later, Steve Rennick, Sr. also arrived. Steve Rennick Sr. and Matt Elliot left the warehouse in one vehicle, and Steve Rennick, Jr. left in another vehicle. Both vehicles were stopped, and the three suspects were detained. RENU Agents then executed a search warrant at the warehouse and seized approximately 450 pounds of marijuana from inside a locked area of the warehouse. Steve Rennick, Sr. had a key to this locked area. Steve Rennick, Sr. stated he transported the boxes containing the marijuana in a truck from Arizona to Cincinnati for Kareem Cole. Rennick, Sr. also indicated that he had a key to the locked area but he rents that area of the warehouse to Kareem Cole.

Steve Rennick Jr. was interviewed and stated that Kareem and Phillip purchased the truck for \$88,000.00 in Arizona and titled it in his father's (Rennick, Sr.) name. Steve Rennick Jr. stated that Kareem and Phillip would pay his father \$5,000.00 to \$10,000.00 a trip. Steve Rennick Jr. stated that he was present on October 15, 2002 when Moore and Elliot came to the warehouse to pick up three or four boxes of what he believed to be

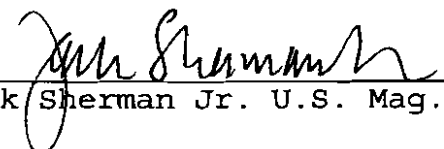
marijuana. Kareem Cole was present when Moore and Elliot picked up the boxes.

RENU Agents meanwhile located the residence of Kareem Cole at 5895 Shadymist, Apt. #2, Cincinnati, Ohio. Kareem Cole and Phillip Davidson were observed leaving the residence on October 16, 2002 in a rental vehicle. The vehicle was stopped, and Cole and Davidson were detained. Search warrants were obtained for the apartment and a vehicle belonging to Kareem Cole. Located in the residence were scales, owe sheets, marijuana , and approximately \$50,000.00 in cash. In the vehicle was a box with approximately twenty-five pounds of marijuana. Kareem Cole had in his possession a key to the locked area in the warehouse at 1975 West North Bend where the 450 pounds of marijuana was found. Phillip Davidson had in his possession the key to the door of the warehouse.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 18, 2002.


JOHN MERCADO

Sworn to and subscribed in my presence this 18th day of October, 2002.


Jack Sherman Jr. U.S. Mag. J.